

REMARKS

The Examiner is thanked for the thorough examination of the present application. The Office Action, however, tentatively rejected all claims 1-20 under 35 U.S.C. §102(c). In reply to the Office Action, independent claims 1 and 11 are amended to include the features embodied in original claims 10 and 20, respectively (and claims 10 and 20 are correspondingly canceled). Claims 1 and 11 are further amended to clarify the phrase "serial data process engines."

Support of these amendments can be found at least in Fig. 4 of the present application (and related description), showing that process engines 410 and 420 are serial data process engines and that process engine 420 fetches data from the symmetry data sources 450 and results from process engine 410. Accordingly, the claim amendments add no new matter to the application.

Response to Objections of Claim

The Office Action objected to claim 20. The objection, however, is rendered moot by the cancellation of that claim.

Response To Claim Rejections Under 35 U.S.C. §102

Claims 1-9 and 11-19 stand rejected under 35 U.S.C. §102(c) as allegedly anticipated by *Pape* (U.S. Patent No. 6,664,897). Applicant respectfully traverses these rejections on the grounds that *Pape* does not disclose, teach, or suggest all the claimed elements in the claimed embodiments.

For a proper rejection of a claim under 35 U.S.C. Section 102(b), the cited reference must disclose all elements/features/steps of the claim. See, e.g., *E.I. du Pont de Nemours & Co. v.*

Phillips Petroleum Co., 849 F.2d 1430, 7 USPQ2d 1129 (Fed. Cir. 1988).

Independent claim 1, as currently amended, states:

1. A symmetry database system for a data processing system, comprising:
 - a data source for storing source data;
 - a data preparation platform to filter the source data into a symmetry data source; and
 - a plurality of process engines to fetch data from the symmetry data source and generate results according to the data;wherein the process engines are *serial data process engines*, and *one of the process engines fetches both data from the symmetry data source and results from another of the process engines*.

(*Emphasis added*). Independent claim 1 is allowable for at least the reason that *Pape* does not disclose, teach, or suggest the features that are highlighted in claim 1 above, where serial data process engines have one process engine fetching both data from the symmetry data source and results from another process engine.

The Office Action (in page 7) refers to Col. 18, lines 25-35 and Col. 42, lines 15-65 of *Pape* as allegedly disclosing this feature. Particularly, the Office Action comments that “processing supply chain entities are equivalent to Applicant’s “process engines” and the description of data flow in the supply chain implies these supply chain entities related as serial process engines as in Applicant’s claim language.” *However, the data flow taught in Pape indicates that these supply chain entities are not serial process engines as defined in Applicant’s claim language.*

In fact, col. 18, lines 25-35 of *Pape* states, with reference to “the processing supply chain entities,” that “data may be pulled from the data mart at step 130 by the processing supply chain entities that collected data.” Significantly, col. 18, lines 25-35 of *Pape* does not teach that the processing supply chain entities are serial process engines, as expressly defined in the Applicant’s claim language. For at least this reason, the rejections are misplaced and should be withdrawn.

In addition, neither does Col. 42, lines 15-65 of *Pape* teach serial process engines as defined

in the Applicant's claim language. The description of col. 42, lines 15-65 refers to Fig. 7 of *Pape* that shows processing supply chain entities 83-85, 98, 101, and 103 fetching only data from data mart 121. There is no such a data flow "in" the supply chain as indicated by the Office Action. There is no evidence that any of the processing supply chain entities of *Pape* fetches data from any other processing supply chain entity. In fact, most likely, the data of processing supply chain entities 83-85, 98, 101, and 103 are not sent to one another, since col. 42, line 24 teaches that "the data was collected at step 16", which, as clearly shown in Fig. 7, brings the data away from all processing supply chain entities. Col. 42, lines 53-55 further states that "the data ... is pushed at step 117 to PERD transaction database 118, where it is available at the next stage for sharing with previous and subsequent owners." According to Fig. 7, the next stage where the data is available means data marts 121 that provide data to previous and subsequent owners, or processing supply chain entities. Clearly, col. 42, lines 15-65 of *Pape* merely teaches that processing supply chain entities fetch data from data marts 121, but fails to teach that one processing supply chain entity fetches both data from data marts 121 and results from another processing supply chain entity, as required in the claimed embodiments.

Significantly, nowhere in *Pape* is it taught that one of the process engines fetches both data from the symmetry data source and results from another of the process engines. Since *Pape* does not disclose, teach, or suggest all the claimed elements in each claimed embodiment, the 102(e) rejection of claim 1 is misplaced and should be withdrawn.

As independent claim 1 is allowable over the prior art of record, then dependent claims 2-9 are allowable as a matter of law, because these dependent claims contain all features/elements/steps of their respective independent claim 1. *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988).

Independent claim 11, as currently amended, states:

11. A symmetry database method for a data processing system, comprising the steps of:

providing a data source for storing source data;
filtering the source data into a symmetry data source using a data preparation platform; and
fetching data from the symmetry data source by a plurality of process engines, and generating results according thereto;
wherein the process engines are *serial data process engines*, and *one of the process engines fetches both data from the symmetry data source and results from another of the process engines*.

(Emphasis added)

The highlighted features in claim 11 above are similar to those highlighted in claim 1, which *Pape* fails to teach, disclose, or suggest as previously discussed for the allowability of claim 1. Therefore, claim 11 should be allowable, and its dependent claims 12-19 are also allowable as a matter of law, for at least the same reasons discussed in connection with claim 1.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicant respectfully submits that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims 1-9 and 11-19 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

No fee is believed to be due in connection with this amendment and response. If, however, any fee is deemed to be payable, you are hereby authorized to charge any such fee to Deposit Account No. 20-0778.

Respectfully submitted,



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